6. ALTERNATIVES

Introduction

This section provides an analysis of a reasonable range of alternatives to the Proposed Project. The primary intent of the alternatives evaluation in an EIR, as stated in Section 15126(d) of the CEQA Guidelines, is to "describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." Further, the Guidelines (Section 15126(d)(1)) state that "the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly." The feasibility of an alternative may be determined based on a variety of factors including, but not limited to, site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and site accessibility and control (Section 15126(d)(5)(A)).

The CEQA Guidelines (Section 15126(d)(4)) require that the No Project Alternative and its impacts be evaluated. The "no project" analysis shall "discuss the existing conditions, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services." The EIR must also identify the environmentally superior alternative. If the environmentally superior alternative is the No Project Alternative, then CEQA requires that the EIR also identify an environmentally superior alternative from among the other alternatives (CEQA Guidelines Section 15126(d)(2)).

Project Objectives

Project objectives are used as the basis for comparing project alternatives and determining the extent that the objectives would be achieved relative to the Proposed Project. The County Department of Planning and Resource Management has identified the following objectives for the Proposed Project:

- Diversify the Fresno County economy to provide a broad range of employment opportunities.
- Reduce unemployment and promote the creation of higher wage jobs.
- Minimize conversion of agricultural land.
- Promote compact urban development.

- Minimize destruction and disturbance of natural habitat.
- Enhance the quality of life for residents of Fresno County.

Alternatives To The Proposed Project

Background

In March 1998, the County published a report entitled *Economic and Growth Scenarios: Perspectives on the Year 2020*, which described five economic scenarios. The report, a key document of the County's General Plan, addressed the following issues: the potential for employment and income growth in Fresno County; potential barriers and constraints to achieving economic growth; the County's physical and financial "carrying capacity" for new development; and the physical, financial, and resource implications of various economic and growth scenarios. The document was the basis for discussion in public forums and open houses held throughout the County over a three-month period in Spring 1998. This included a presentation to the planning directors of Fresno County's 15 cities. County staff also distributed questionnaires to elicit residents' preferences regarding the County's future economy and land use patterns. The result was summarized into a list of issues and value statements that was forwarded to the Fresno County Planning Commission.

After three public hearings, the Planning Commission recommended that the Board of Supervisors direct the pursuit of a combination of three economic scenarios. In July 1998, after conducting two public hearings, the Board endorsed the Planning Commission's recommendations with minor modifications.

Alternatives Analyzed in this Draft EIR

The following alternatives are evaluated in this section.

No Project Alternative

CEQA requires the evaluation of the comparative impacts of the "No Project" alternative (CEQA Guidelines Section 15126.6(e)(1)). The No Project alternative refers to the consequences of declining to adopt a project or project alternatives. Two "No Project" alternatives can be considered: "No Development" or "No Action". The No Project/No Development Alternative describes an alternative in which no development would occur, and the current conditions in the planning area would remain. Under the No Project/No Development Alternative, there would not be additional development in the unincorporated portions of Fresno County. The environmental impacts of the No Project/No Development alternative are best described by the existing conditions described in the General Plan Background Report. However, given that residential and other development is largely market-driven, and that there are existing entitlements for development in the county (and cities), it is unlikely that a

No Project/No Development Alternative would be implemented. Even if the County were to cease approving new projects, new development could continue in the cities. Because most new growth is anticipated to occur in the cities, most of the environmental effects described in Chapter 4 would likely occur even if the County chose to cease development approvals.

The No Project Alternative must also consider the impacts that would occur if the County did not approve the project, but development continued under the current General Plan. This "No Action" Alternative is a more realistic forecast of the consequences of not acting on the Proposed Project. In the case of the General Plan, the No Action Alternative is based on Scenario A from the March 1998 *Economic and Growth Scenarios Report*. The No Project/No Action Alternative assumes that population will grow in accordance with the 1998 Department of Finance projections, identical to those of the Proposed Project, but that the County would not pursue the Economic Development Strategy or adopt the Draft General Plan policies.

Under the No Project/No Action Alternative, county population in 2020 would be 1,113,785, identical to the Proposed Project. The number of households and dwelling units, and the amount of land containing residential units in 2020 would be the same as the Proposed Project. Year 2020 total employment under the No Project/No Action alternative is projected to be 501,350, approximately 100,000 individuals less than the Proposed Project. Job growth would not accelerate as projected for the Proposed Project scenario, and the employment profile would reflect current trends, as described in Scenario A. Only 45 percent of the population in 2020 is projected to have jobs, compared to 54 percent for the Proposed Project. Tables 6-1 and 6-2 show the geographic distribution of land use (acreage) and population, respectively, as compared to the Proposed Project.

Under the No Project/No Action Alternative, population growth in each of the SOIs and unincorporated areas is projected to be identical to the Proposed Project, so the amount of land developed for residential uses would be the same. The No Project/No Action Alternative would not include policies to direct residential growth into the urban areas. Consequently, it is possible that the proportion of residential development in the unincorporated areas would be somewhat higher under this alternative (compared to the Proposed Project), with a corresponding reduction in residential development in the incorporated areas. The extent to which this shift would occur is speculative, so it has not been quantified.

Less land would be needed for employment-generating uses under the No Project/No Action Alternative, because the Economic Development Strategy would not be implemented. Under the No Project Alternative, development in the incorporated and unincorporated areas would use approximately 4 percent less land county-wide than the Proposed Project. Fewer acres would be converted in the incorporated areas of the Eastside Valley, Westside Valley (incorporated and unincorporated areas), Sierra Nevada foothills, and Coast Range foothills.

TABLE 6-1

GEOGRAPHIC DISTRIBUTION OF LAND USE (ACRES) - COMPARISON OF ALTERNATIVES TO PROPOSED PROJECT

	Existing Land Use	Proposed Project			No Project Alternative			High Growth Alternative			Internal Residential Development Reduction		
Subregion/Area		2020 Acres	% Change		2020 Acres	% Change	%PP	2020 Acres	% Change	%PP	2020 Acres	% Change	%PP
East Valley													
Incorporated (SOI)	65,262	99,472	52%		95,600	46%	-4%	103,949	59%	5%	77,631	19%	-22%
Uninincorporated	7,852	9,652	23%		9,618	22%	0%	36,728	368%	281%	9,652	23%	0%
Total	73,114	109,124	49%		105,218	44%	-4%	140,677	92%	29%	87,283	19%	-20%
West Valley													
Incorporated (SOI)	2,418	3,508	45%		3,320	37%	-5%	4,705	95%	34%	2,822	17%	-20%
Unincorporated	796	1,147	44%		1,118	40%	-3%	1,736	118%	51%	1,147	44%	0%
Total	3,214	4,655	45%		4,438	38%	-5%	6,441	100%	38%	3,969	23%	-15%
Sierra Nevada Foothills	1,093	1,319	21%		1,310	20%	-1%	2,768	153%	110%	1,319	21%	0%
Sierra Nevada Mountains	448	491	10%		493	10%	0%	1,375	207%	180%	491	10%	0%
Coast Range Foothills	24	26	8%		27	13%	4%	43	79%	65%	26	8%	0%
Total	1,565	1,836	17%		1,830	17%	0%	4,186	167%	128%	1,836	17%	0%
Incorporated (SOI)	67,680	102,980	52%		98,920	46%	-4%	108,654	61%	6%	80,453	19%	-22%
Unincorporated	10,213	12,635	24%		12,566	23%	-1%	42,650	318%	238%	12,635	24%	0%
County Total	77,893	115,615	48%		111,486	43%	-4%	151,304	94%	31%	93,088	20%	-19%

% Change = % change from 1996 conditions
%PP = % change relative to Proposed Project

TABLE 6-2

GEOGRAPHIC DISTRIBUTION OF POPULATION - COMPARISON OF ALTERNATIVES TO PROPOSED PROJECT

Geographic Area	Existing 1996	Proposed Project, No Project Alternative and Increased Residential Densities Alternative			High Growth Alternative		
		2020	% Change	% PP	2020	% Change	% PP
East Valley							
Incorporated (SOI)	622,100	929,200	49%		986,336	59%	6%
Unincorporated	87,705	106,197	21%		398,817	355%	276%
Total	709,805	1,035,397	46%		1,385,153	95%	34%
West Valley							
Incorporated (SOI)	30,606	42,094	38%		56,713	85%	35%
Unincorporated	11,142	15,346	38%		23,766	113%	55%
Total	41,748	57,440	38%		80,479	93%	40%
Sierra Nevada Foothills	11,727	13,938	19%		28,704	145%	106%
Sierra Nevada Mountains	6,146	6,711	9%		18,555	202%	176%
Coast Range Foothills	274	299	9%		478	74%	60%
Total	18,147	20,948	15%		47,737	163%	128%
Incorporated Total (SOI)	652,706	971,294	49%		1,043,049	60%	7%
Unincorporated Total	116,994	142,491	22%		470,320	302%	230%
County Total	769,700	1,113,785	45%		1,513,369	97%	36%

% Change = % change from 1996 conditions

%PP = % change relative to Proposed Project

The No Project Alternative analyzed in detail in this chapter is the No Action Alternative. The No Development Alternative is best described as the conditions identified in the *Fresno County General Plan Update Background Report*.

High Growth Alternative

This alternative is based on higher growth projections prepared by the California Department of Finance (1997) and Scenario E from the March 1998 *Economic and Growth Scenarios Report.* Under the High Growth Alternative, county population in 2020 would be 1,513,369, approximately 36 percent higher than the Proposed Project. Year 2020 total employment under the High Growth Alternative is projected to be approximately 710,000 or about 207,000 jobs more than the Proposed Project. Tables 6-1 and 6-2 show the geographic distribution of land use (acreage) and population, respectively, as compared to the Proposed Project. Although the population would increase, only 47 percent of the population in 2020 is projected to have jobs, compared to 54 percent for the Proposed Project.

The High Growth Alternative would result in greater need for housing to accommodate projected growth, resulting in the development of approximately 27,000 more acres of residential development than the Proposed Project. Substantial development would occur in the unincorporated county, slightly exceeding the population capacity of current county residential zoning.

Under this alternative, the cities of Huron, San Joaquin, Clovis, Fresno, Reedley, and four of the five unincorporated geographic areas are projected to have land shortages (compared to only one City, Fresno, under the Proposed Project). Overall, the demand for land would exceed the remaining available land within the spheres of influence or planning/specific plan area by approximately 2,900 acres.

Increased Residential Development Densities Alternative

Employment and population projections under this alternative are the same as for the Proposed Project. However, residential development densities would be increased and residential development projections by acreage would therefore be reduced. Higher residential development densities would be comparable to those recommended in the report, *A Landscape of Choice*, which was endorsed by the Board of Supervisors in October 1998. These projections are based on average densities of 6 dwelling units per acre (DU/ac) for single-family housing and 12 units per acre for multi-family housing, as compared to 4 dwelling units per acre (DU/ac) for single-family residences, and 8 DU/ac for multi-family housing under the Proposed Project. Tables 6-1 and 6-2 show the geographic distribution of land use (acreage) and population compared to the Proposed Project.

Total population growth under the Increased Residential Development Densities Alternative and areas where that growth would occur would be identical to the Proposed Project. However, because of greater housing density, there would be less demand for land. The Increased Residential Development Densities Alternative would consume approximately 19 percent less land than the Proposed Project.

Less land would be consumed in the incorporated areas of the East and Westside Valley. Land use in the Sierra Nevada foothills and mountains and Coast Range foothills would be identical to the Proposed Project.

This analysis assumes that this alternative would include the Economic Development Strategy, Landscape of Choice and Draft General Plan policies.

Alternatives Considered But Eliminated From Detailed Analysis

This chapter provides an analysis of a reasonable range of alternatives to the Proposed Project and alternative sites. There are an infinite variety of alternatives that could be considered, including various economic scenarios and configurations of land uses within the county. Analysis of every possible option and/or alternative configuration of land uses would overburden the EIR with an unnecessary level of detail which would be redundant, complex, and confusing, without providing meaningful information. The following alternatives, which were initially considered during the scoping process for the EIR, are not addressed in detail in this EIR because they clearly would be infeasible in relation to project objectives, would not substantially reduce significant impacts of the Proposed Project, and/or would be sufficiently similar to an alternative in the EIR so as not to contribute substantially to informed decisionmaking.

Reduced Population Growth: This EIR does not consider an alternative that assumes a substantially reduced population. Countywide population growth would be the primary source of most impacts in the future, as reflected in the environmental analysis in Chapter 4. Most of the population growth would occur in the incorporated areas. The County cannot restrict growth in these areas, as they are under the jurisdiction of cities. The County could restrict residential development in the unincorporated areas, but as discussed under the No Project/No Development Alternative, such a small portion of population growth is anticipated in the County that eliminating it would not substantially alter the environmental effects of growth. Further, if the County were to limit residential development in the unincorporated areas, the development may simply shift to the cities, so that there would not be a reduction in county-wide population. For these reasons, the EIR does not consider a reduced population alternative.

Alternative Land Use Map: The Proposed Project does not alter the County's land use designations. Because the environmental impacts evaluated in the EIR are the result primarily of project growth and economic activity, changes to the land use map would not substantially alter conclusions about the nature or significance of project impacts.

Off-site Alternative: An offsite alternative can reduce impacts for individual development projects. However, for planning documents for entire jurisdictions, there are no alternate locations to be considered. That is, the location of the county cannot be altered. Therefore, an offsite alternative is not considered.

Analysis of Alternatives

Each alternative was evaluated to determine whether potential environmental effects would be greater or less than the Proposed Project. The following analysis is not intended to evaluate the economic feasibility of an alternative involving an employment profile or housing density that differs from the Proposed Project. Rather, the analysis focuses on whether the employment profile (reflected in the amount of acreage developed for each type of use) or housing density (amount of land developed for residential uses) would result in fewer or more environmental impacts than the Proposed Project. Where environmental impacts would be similar, the analysis indicates, where possible, the magnitude of the impact. The results of the comparative analysis, by issue area, are summarized in Table 6-3.

Because no changes to land use designations are proposed under the Proposed Project or alternatives, the specific location of future development is not the subject of this analysis. Instead, the analysis examines the amount of acreage that would be converted county-wide (and in some cases by geographic region) and the changes in population and employment activity under each alternative.

LAND USE

No Project Alternative

As discussed in Chapter 4.2, the Proposed Project would have a less-than-significant impact related to consistency with other plans and land use compatibility, and disruption of existing communities. Like the Proposed Project, development under the No Project Alternative would need to be consistent with local plans and policies, and would not disrupt or divide an existing community. Existing General Plan policies would generally ensure that new development is compatible with surrounding uses. For these reasons, the land use impacts of the No Project Alternative would be similar to the Proposed Project, and would be less than significant for development in the County.

Like the Proposed Project, the impacts of the No Project Alternative with respect to land use compatibility for development outside of the County's jurisdiction would be significant and unavoidable.

High Growth Alternative

Under the High Growth Alternative, the Draft General Plan policies would ensure that new development under County jurisdiction would be consistent with local plans and compatible with surrounding land uses. This alternative would increase the potential for incompatibilities simply because substantially more growth would occur in the unincorporated areas (a 3-fold increase over existing population, compared to a 22% increase in population under the Proposed Project).

TABLE 6-3

COMPARISON OF ALTERNATIVES TO THE PROPOSED PROJECT

Resource	No Project Alternative	High Growth Alternative	Increased Residential Development Densities Alternative
Land Use	–	+	–
Agriculture	–	0	–
Transportation and Circulation	–	+	–
Wastewater, Storm Drainage, and Flooding	–	+	–
Public Services	–	+	–
Cultural Resources	–	+	–
Water Resources	–	+	–
Biological Resources	–	+	–
Forestry Resources	–	0	0
Mineral Resources	–	+	0
Air Quality	–	+	0
Seismic and Geologic Hazards	0	+	0
Hazardous Materials	–	+	0
Noise	–	+	–
Visual Quality	0	+	–

Notes:

+ Impacts would be greater in magnitude, as compared to the Proposed Project.
- Impacts would be less reduced in magnitude, as compared to the Proposed Project.
0 Impacts would be similar in magnitude to the Proposed Project.

Nonetheless, implementation of Draft General Plan polices would reduce potential incompatibilities to a less-than-significant level for development under County jurisdiction. This alternative would not disrupt or divide an existing community. For these reasons, land use impacts under the High Growth Alternative would be less than significant for development under County jurisdiction, but the magnitude of the impacts would be more severe than under the Proposed Project.

Like the Proposed Project, the impacts of the High Growth Alternative with respect to land use compatibility for development outside of the County's jurisdiction would be significant and unavoidable.

Increased Residential Development Densities Alternative

The same amount of development would occur under this alternative as under the Proposed Project. However, residential development would be more compact, reducing the likelihood of conflicts with surrounding uses. Like the Proposed Project, the Draft General Plan policies would ensure that new development under County jurisdiction would be consistent with local plans and compatible with surrounding land uses, and this alternative would not disrupt or divide an existing community. For these reasons, land use impacts under the Increased Residential Densities Alternative would be less than significant for development under County jurisdiction, and the magnitude of the impacts would be less severe than under the Proposed Project.

Like the Proposed Project, the impacts of the Increased Residential Development Densities Alternative with respect to land use compatibility for development outside of the County's jurisdiction would be significant and unavoidable.

AGRICULTURE

No Project Alternative

Like the Proposed Project, the No Project Alternative would affect agricultural resources in the County. The No Project Alternative would convert approximately 33,600 acres of farmland to urban land uses, which is 11 percent less conversion of agricultural land than would occur under the Proposed Project (approximately 37,700 acres). Like the Proposed Project, lands converted under the No Project Alternative would be mainly prime and/or important or unique soils. The estimated cost of crop loss resulting from urbanization would be between $201,606,000 and $504,015,000, compared to approximately $226,422,000 to $566,055,000 in crop loss under the Proposed Project. As with the Proposed Project, the impacts of the No Project Alternative on agricultural resources would be significant and unavoidable. However, because fewer acres would be converted, the impacts would be less severe under the No Project Alternative.

High Growth Alternative

The High Growth Alternative would result in similar, but more severe impacts on agricultural resources, compared to the Proposed Project, because the High Growth Alternative would take substantially more land out of agricultural production. The High Growth alternative would result in approximately 73,411

acres of farmland converted to urban land uses. This is 31 percent more conversion than would occur under the Proposed Project. Lands converted would mainly be prime and/or important or unique soils. Crop loss would result in between $440,466,000 and $1,101,165,000, almost double the anticipated loss in crop production that would occur under the Proposed Project. As with the Proposed Project, impacts on agricultural resources would be significant and unavoidable under the Higher Growth Alternative.

Increased Residential Development Densities Alternative

Although the amount of development under this alternative would be the same as the Proposed Project, the number of acres that would be urbanized would be lower, because residential densities would be increased. Therefore, this would convert less agricultural land, approximately 15,200 acres, to urban uses than the Proposed Project. This is 19 percent less agricultural land conversion than would occur under the Proposed Project. Like the Proposed Project, converted lands would be primarily prime and/or important or unique soils. Estimated crop loss would cost $91,170,000 and $227,925,000, less than half the crop loss anticipated under the Proposed Project. Although this alternative would have less severe impacts on agricultural resources than the Proposed Project, the impacts would remain significant and unavoidable because the amount of converted acreage would be substantial, and prime and other valuable agricultural soils can not be replaced once they are converted.

TRANSPORTATION AND CIRCULATION

No Project Alternative

Under the No Project Alternative, county-wide daily vehicle miles traveled (VMT) would increase from base conditions of approximately 16,954,000 VMT to approximately 30,164,000 VMT in 2020. County-wide daily trips would increase from approximately 2,558,000 trips per day to approximately 3,866,000 trips per day in 2020. Daily trips would be slightly less (approximately 6 percent) than the Proposed Project. However, the average county-wide trip distances would be approximately 7.8 miles, which is slightly greater than the 7.5 miles associated with the Proposed Project. As with the Proposed Project, roadway segments in the unincorporated and incorporated areas would operate at unacceptable service levels as a result of increased growth. The level of congestion would be slightly reduced, because there would be fewer trips. Nonetheless, the increase in traffic congestion would remain significant and unavoidable.

Like the Proposed Project, the No Project Alternative would increase demand for transit services and bicycle facilities. Because funding for such facilities would not be assured, the demand could exceed capacity of current and planned transit and bicycle infrastructure. This would be a significant and unavoidable impact, although less severe than the Proposed Project, because there would be slightly less demand due to the reduction in employment uses.

Airports

Safety issues associated with airports and airstrips are primarily concerned with hazards posed to departing and landing aircraft and hazards to aircraft on the ground. Population growth under the No Project Alternative would be identical to the Proposed Project. Therefore, the same number of people could be exposed to aircraft crash hazards on the ground. However, the amount of land developed would be slightly less than under the Proposed Project, both for residential and non-residential uses. As with the Proposed Project, such land uses are allowed within close proximity to airports, and development is subject to stringent federal and State regulations and local land use compatibility guidelines. Therefore, the No Project Alternative would result in the same less-than-significant impact as the Proposed Project. Because the amount of developed land would be less, there would be a commensurate reduction in the risk to property, and the impact would be reduced in magnitude, as compared to the Proposed Project.

High Growth Alternative

Total county-wide average daily trip generation under this alternative is projected to be approximately 5,093, about 24 percent higher than the number of trips under the Proposed Project. Projected county-wide vehicle miles traveled (VMT) under this alternative is expected to be approximately 40,240,000, or about 30 percent higher than the Proposed Project. Assuming only those roadway improvements contained in the COFCG's 2016 RTP, about 16 million VMT would be subject to level of service F. Approximately 23.5 million miles would be subject to LOS D through F. These levels are substantially higher than the corresponding totals for the Proposed Project, particularly in the unincorporated areas. Overall, transportation and circulation effects would be greater than those associated with the Proposed Project, and, like the Proposed Project, these impacts would be significant and unavoidable.

Under this alternative demand for transit, bicycle, and pedestrian facilities would increase by approximately 40 percent compared to the Proposed Project due to the higher population growth. Because funding for such facilities would not be assured, the demand could exceed capacity of current and planned transit, bicycle and pedestrian infrastructure. This would be a significant and unavoidable impact, and more severe than the Proposed Project.

Airports

The High Growth Alternative would result in a greater number of people and properties that could be exposed to aircraft crash hazards on the ground, as compared to the Proposed Project. However, as described above, implementation of federal and State regulations would reduce this risk, so effects would be similar to the Proposed Project.

Increased Residential Development Densities Alternative

Because the number of new residences would be the same as the Proposed Project, this alternative would generate a similar number of daily person trips. If the increased density was achieved by increasing the proportion of multifamily and other high-density housing, the number of trips would

be reduced, because higher density housing typically generates fewer trips per unit than lower density housing. The total vehicle miles traveled could be reduced as well, as more compact development could result in people living closer to their jobs and neighborhood services. While the average number and length of trips may be reduced relative to the Proposed Project, there could be increased congestion in some areas. If higher density development occurs in urban areas without transit and other non-automotive facilities, or if people simply choose to continue to drive, then congestion on urban streets could increase. For these reasons, traffic impacts would likely be similar to the Proposed Project, but slightly less severe due to the more compact nature of residential development.

Like the Proposed Project, this alternative would increase demand for transit services and bicycle facilities. More compact urban development could increase demand for such facilities. At the same time, non-automotive facilities are easier to provide, and may be more likely to be funded, in urban areas than rural areas, because more people can be served in a smaller area. Furthermore, infill development would take advantage of unused capacity in existing systems. For these reasons, impacts on transit and bicycle facilities would be less severe than the Proposed Project. Nonetheless, the impact would remain significant and unavoidable, because funding for such facilities would not be assured.

Airports

Safety issues associated with airports and airstrips are primarily concerned with hazards posed to departing and landing aircraft and hazards to aircraft on the ground. Population growth under the Increased Residential Development Densities Alternative would result in an increase in population identical to the Proposed Project. Although housing densities would be greater than the Proposed Project, and, consequently, a greater number of people and structures that could theoretically be exposed to aircraft crash hazards on the ground, restrictions on maximum densities for residential and non-residential uses and acceptable uses in airport safety zones for each airport would be imposed. This alternative would not alter airport uses or flight patterns, and aircraft operations would be subject to stringent federal and State laws and regulations. Therefore, impacts would be the same as the Proposed Project.

WASTEWATER, STORM DRAINAGE, AND FLOODING

No Project Alternative

Wastewater

Under the No Project Alternative, development through 2020 would result in relatively less urban growth and commensurately more rural residential development. The incremental volume of wastewater collected and treated would probably be lower than under the Proposed Project. However,

there would still be an increase in wastewater flows, which could result in the need for some improvements to centralized wastewater systems. Thus, there would be no substantial difference between the No Project Alternative and the Proposed Project in this respect.

Under the No Project Alternative, more rural residential development would occur than under the Proposed Project. This would result in the installation of a higher number of new individual septic systems, which would not be subject to the siting and density standards established in the Draft General Plan. Consequently, impacts related to the need for and use of individual septic systems could be greater in magnitude than with the Proposed Project.

Storm Drainage and Flooding

Because the No Project Alternative would result in relatively less urban growth and commensurately more rural residential development than the Proposed Project, there would be less impervious coverage and greater opportunity for on-site percolation of rainwater and storm drainage under this alternative. Thus the overall potential for drainage and flooding impacts would be lower than under the Proposed Project. However, when effective implementation of urban drainage and flood control programs and development mitigation requirements is considered, along with the Draft General Plan policies that support and enhance those programs, there would be little difference in the net drainage and flooding impacts between the Proposed Project and the No Project Alternative. However, the relative impacts under the Proposed Project may be slightly greater due to the increase in unmitigated downstream flooding potential from incremental development in some smaller cities.

As with the Proposed Project, new development proposed within special flood hazard areas as delineated by FEMA on the FIRMs would be subject to the County's Flood Plain Management Ordinance, which specifies development standards to avoid flood damage and minimize loss of flood conveyance or storage volume. The application of this ordinance to new projects, together with the existing General Plan policies would minimize potential flooding impacts to new development in the unincorporated areas. The relatively greater increment of rural residential growth that would occur under the No Project Alternative would also be subject to the County's Flood Plain Management Ordinance and policies. The County's Flood Plain Management Ordinance would apply equally to new development under the No Project Alternative. For these reasons, the potential exposure to flooding under the No Project Alternative would be similar to the Proposed Project.

As with the Proposed Project, new development would generally be protected from dam inundation by existing policies of the Division of Dam Safety. However, not all areas subject to dam failure inundation have been clearly delineated, so it is possible that the siting of new development or adoption of emergency planning actions may not be in place in some locations within the County. This potential would be greater under the Proposed Project, because it provides for more development in areas subject to dam failure inundation than the No Project Alternative.

As with the Proposed Project, under the No Project Alternative most growth would occur in the urban areas. The County cannot compel the cities to develop ordinances or adopt policies to protect people and property from flooding hazards, or ensure that similar storm drainage management policies and practices would be implemented. Therefore, these impacts may remain significant and unavoidable for development outside of the County's jurisdiction.

High Growth Alternative

Wastewater

The High Growth Alternative would result in substantially more urban residential development than the Proposed Project, so more wastewater would be generated, requiring additional conveyance and treatment facilities. Depending on their size, location and design, these facilities could affect biological and other natural resources, as well as create incompatibilities with surrounding land uses. The Draft General Plan policies would reduce the environmental effects of expanded and new wastewater facilities; however, because the size, location and design of such facilities has not been determined, the specific impacts of such facilities cannot be assessed at this time. Therefore, this impact would remain significant and unavoidable, and would be more severe than under the Proposed Project.

Rural development would also be substantially higher, so there would be an increase in the installation of new individual septic systems relative to the Proposed Project. As with the Proposed Project, the siting and density standards established in the Draft General Plan would ensure that septic-related impacts would be less than significant.

Storm Drainage and Flooding

Because this alternative would substantially increase the amount of development occurring in the county (36,000 more acres developed than under the Proposed Project), impervious coverage would increase relative to the Proposed Project, leading to more stormwater runoff and less opportunity for on-site percolation of rainwater. Consequently, the overall potential for drainage and flooding impacts would be higher than under the Proposed Project. Effective implementation of urban drainage and flood control programs, along with the Draft General Plan policies that support and enhance those programs, would reduce the effects of increased impervious surface. As with the Proposed Project, the impact would remain significant and unavoidable, because the location and effects of drainage facilities needed to accommodate additional runoff cannot be determined at this time. Storm drainage and flooding impacts would be increased relative to the Proposed Project.

As with the Proposed Project, new development proposed within special flood hazard areas as delineated by FEMA on the FIRMs would be subject to the County's Flood Plain Management Ordinance, which specifies development standards to avoid flood damage and minimize loss of flood

conveyance or storage volume. The application of this ordinance to new projects, together with the Draft General Plan policies would minimize potential flooding impacts to new development in the unincorporated areas. Nonetheless, the impact would be more severe due to the increased population and associated development.

As with the Proposed Project, new development would generally be protected from dam inundation by existing policies of the Division of Dam Safety. However, not all areas subject to dam failure inundation have been clearly delineated, so it is possible that the siting of new development or adoption of emergency planning actions may not be in place in some locations within the county. This potential would be greater under the High Growth Alternative than the Proposed Project, because development and population growth would increase substantially (by approximately 40 percent).

As with the Proposed Project, under the High Growth Alternative most development would occur in the urban areas. The County cannot compel the cities to develop ordinances or adopt policies to protect people from flooding hazards, or ensure that similar storm drainage management policies and practices would be implemented. Therefore, these impacts may remain significant and unavoidable for development outside of the County's jurisdiction.

Increased Residential Development Densities Alternative

Wastewater

Under the alternative, development levels would be the same as under the Proposed Project, so a similar amount of wastewater would be generated. Like the Proposed Project, the increase in wastewater flows could result in the need for some improvements to centralized wastewater systems. Thus, there would be no substantial difference between the Increased Residential Development Densities Alternative and the Proposed Project in this respect.

Under the Increased Residential Development Densities Alternative, incremental rural development levels would be lower than under the Proposed Project. This would result in the installation of fewer new individual septic systems. Consequently, impacts related to the need for and use of individual septic systems could be less severe than with the Proposed Project.

Storm Drainage and Flooding

Because 22,000 fewer acres would be developed under the Increased Residential Development Densities Alternative, less impervious coverage would be created than under the Proposed Project. As a result, there would be less stormwater runoff and greater opportunity for rainwater percolation. The overall potential for drainage and flooding impacts would be less severe than under the Proposed Project. However, when effective implementation of urban drainage and flood control programs and development mitigation requirements is considered, along with the Draft General Plan policies that support and enhance those programs, there would be little difference in the net drainage and flooding impacts between this alternative and the Proposed Project.

As with the Proposed Project, new development proposed within special flood hazard areas as delineated by FEMA on the FIRMs would be subject to the County's Flood Plain Management Ordinance, which specifies development standards to avoid flood damage and minimize loss of flood

conveyance or storage volume. The application of this ordinance to new projects, together with Draft General Plan policies would minimize potential flooding impacts to new development in the unincorporated areas. For these reasons, the potential exposure to flooding under the this alternative would be similar to the Proposed Project.

As with the Proposed Project, new development would generally be protected from dam inundation by existing policies of the Division of Dam Safety. However, not all areas subject to dam failure inundation have been clearly delineated, so it is possible that the siting of new development or adoption of emergency planning actions may not be in place in some locations within the County. This impact would be the same as under the Proposed Project.

As with the Proposed Project, under this alternative most growth would occur in the urban areas. The County cannot compel the cities to develop ordinances or adopt policies to protect people from flooding hazards, or ensure that similar storm drainage management policies and practices would be implemented. Therefore, these impacts may remain significant and unavoidable for development outside of the County's jurisdiction.

PUBLIC SERVICES

No Project Alternative

Law Enforcement

Population growth under the No Project Alternative would be identical to and would occur in the same locations as the Proposed Project, so the number of law enforcement personnel and number of stations would be the same as the Proposed Project. However, because approximately 4 percent less land in the incorporated areas and 1 percent less land in the unincorporated areas would be developed, the number of structures would be fewer than under the Proposed Project. Therefore, law enforcement impacts would be somewhat reduced in magnitude, as compared to the Proposed Project. Like the Proposed Project, these impacts would be less than significant for development under County jurisdiction, and significant and unavoidable for development within the cities' jurisdiction.

Fire Protection and Emergency Services

Similar to law enforcement, the demand for fire protection and emergency services personnel would be the same as the Proposed Project. However, because economic growth would not occur as envisioned for the Proposed Project, the number of non-residential structures would be lower than under the Proposed Project. Response times could be slightly less than the Proposed Project. Like the Proposed Project, these impacts would be less than significant for development under County jurisdiction, and significant and unavoidable for development within the cities' jurisdiction.

Parks and Recreation

Implementation of the No Project Alternative would result in the same population as the Proposed Project. Therefore, the ratio of parkland to residents would be the same as for Proposed Project, and impacts would be the same. Like the Proposed Project, these impacts would be less than significant for development under County jurisdiction, and significant and unavoidable for development within the cities' jurisdiction.

Schools

Because population growth under the No Project Alternative would be the same as the Proposed Project, impacts on schools would be identical. As with the Proposed Project, impacts on schools would be less than significant.

Solid Waste

The amount of residential solid waste generated under the No Project Alternative would be identical to the Proposed Project, so impacts would be similar. However, with less economic development, the amount of non-residential solid waste would be less. Overall, impacts on solid waste facilities would be slightly less than the Proposed Project, and would be less than significant.

Library Facilities

Population growth under the No Project Alternative would be identical to, and would occur in the same locations as, the Proposed Project. Because population growth under the No Project Alternative would be the same as the Proposed Project, impacts on libraries would be identical. Like the Proposed Project, these impacts would be less than significant for development under County jurisdiction, and significant and unavoidable for development within the cities' jurisdiction.

High Growth Alternative

Law Enforcement

Implementation of the High Growth Alternative would result in an increase in the unincorporated and incorporated population that is greater than the increase assumed for the Proposed Project. This would require an additional 385 Sheriff's officers compared to the 28 additional patrol officers required for the Proposed Project to maintain a ratio of 1.09 officers to 1,000 residents. This alternative would also require approximately 7 percent more officers in local police forces. Therefore, law enforcement impacts would be greater in magnitude under this alternative, compared to the Proposed Project. Like the Proposed Project, these impacts would be less than significant for development under County jurisdiction, and significant and unavoidable for development within the cities' jurisdiction.

Fire Protection and Emergency Services

Implementation of the High Growth Alternative would increase the population requiring fire protection and emergency services by approximately 36 percent. Depending on where the additional population is located, this could further delay provision of services to areas within the County, especially the eastern foothill area, which currently maintains an ISO rating of 9. Therefore, fire protection and emergency services impacts would be slightly increased in magnitude, as compared to the Proposed Project. Like the Proposed Project, these impacts would be less than significant for development under County jurisdiction, and significant and unavoidable for development within the cities 'jurisdiction.

Parks and Recreation

The population growth under this alternative would be 36 percent greater than the growth assumed under the Proposed Project. The increase would be 230 percent in the unincorporated areas, and would decrease the ratio of parkland per 1,000 residents to less than the required 5 to 8 acres of improved parkland per 1,000 residents. Therefore, implementation of this alternative may not meet the Draft General Plan standards for improved parkland and would result in greater impacts than the Proposed Project.

Schools

Development under the High Growth Alternative would result in an increased population in the incorporated and unincorporated areas that is approximately 36 percent greater than the Proposed Project. This would result in the need for more school facilities than needed to serve the Proposed Project. Implementation of this alternative would result in school impacts that would be greater in magnitude than the Proposed Project. Like the Proposed Project, these impacts would be less than significant for development under County jurisdiction, and significant and unavoidable for development within the cities 'jurisdiction.

Solid Waste

Implementation of the High Growth Alternative would result in population growth that is greater than the growth assumed under the Proposed Project. This would result in an increase in the generation of solid waste to be collected and disposed of at the County landfills. Therefore, solid waste impacts under this alternative would be slightly increased in magnitude, as compared to the Proposed Project. This impact would be less than significant.

Library Facilities

The population growth under the High Growth Alternative would be greater than the growth assumed under the Proposed Project. This would increase the need for additional library services compared to the Proposed Project. Like the Proposed Project, these impacts would be less than significant for development under County jurisdiction, and significant and unavoidable for development within the cities 'jurisdiction.

Increased Residential Development Densities Alternative

Law Enforcement

Population growth under the Increased Residential Development Densities Alternative would be identical to the Proposed Project, so the number of law enforcement personnel and number of stations would be the same as the Proposed Project. Because approximately 22 percent less land in the incorporated areas would be developed, the area to be covered would be less than the Proposed Project, so response times would likely be faster than under the Proposed Project. Therefore, law enforcement impacts would be reduced in magnitude, compared to the Proposed Project. Like the Proposed Project, these impacts would be less than significant for development under County jurisdiction, and significant and unavoidable for development within the cities 'jurisdiction.

Fire Protection and Emergency Services

Similar to law enforcement, the demand for fire protection and emergency services personnel would be the same as the Proposed Project. Response times would be faster than with the Proposed Project, because housing would be concentrated in a smaller area. The amount of non-residential development would be identical to the Proposed Project, so structural fire hazard risks would be similar. There would be no difference in the amount of development in unincorporated areas subject to wildland fire hazard, so risks associated with wildland fires would be the same as the Proposed Project. Like the Proposed Project, these impacts would be less than significant for development under County jurisdiction, and significant and unavoidable for development within the cities 'jurisdiction.

Parks and Recreation

Population growth under the Increased Residential Development Densities Alternative would be the same as the Proposed Project and would result in the same ratio of parkland per 1,000 residents as the Proposed Project. Therefore, this alternative would have the same impact on parks and recreation as the Proposed Project. Like the Proposed Project, these impacts would be less than significant for development under County jurisdiction, and significant and unavoidable for development within the cities 'jurisdiction.

Schools

Population growth under the Increased Residential Development Densities Alternative would be the same as the Proposed Project, so impacts on schools would be identical. As with the Proposed Project, these impacts would be less than significant.

Solid Waste

The amount of residential and non-residential development would be the same as the Proposed Project, so impacts on solid waste facilities would be identical, and would be less than significant.

Library Facilities

Because population growth under the Increased Residential Development Densities Alternative would be the same as the Proposed Project, the impacts on library facilities would be identical. Like the Proposed Project, these impacts would be less than significant for development under County jurisdiction, and significant and unavoidable for development within the cities' jurisdiction.

CULTURAL RESOURCES

No Project Alternative

Land that has been used for certain types of agricultural production, grazing or other activities that do not require extensive excavation and/or grading, or that is undeveloped, could contain cultural resources, particularly near drainages and in woodlands. Urbanized areas that have been developed are not as likely to contain buried resources, although historic structures (e.g., buildings and bridges) may be more prevalent. As with the Proposed Project, urbanization associated with future growth could damage or destroy archaeological or prehistoric resources, if present, during excavation and/or grading. The No Project Alternative would result in a slight reduction in the amount of undeveloped land converted to urban uses in the incorporated areas of the Eastside Valley and in the Westside Valley, Sierra Nevada foothills, and Coast Range foothills, as compared to the Proposed Project. Although cultural resources may be present in these areas, the effects would be reduced in magnitude because less land would be disturbed. With slightly less development in the incorporated areas, known historic resources may be less affected than might occur with the Proposed Project.

High Growth Alternative

Under the High Growth Alternative, more urbanization would occur in the unincorporated areas of the Eastside Valley, Sierra Nevada foothills, and Sierra Nevada than under the Proposed Project (approximately 60,000 total acres compared to approximately 2,100 acres). Records indicate that most Native American tribes in the area lived near rivers and streams and wildlife resources, particularly in the Sierra Nevada foothills, so these areas would be more likely to contain prehistoric resources.

In the Sierra Nevada foothills, for example, there would be a greater probability of encountering such resources because 1,675 acres would be developed, as compared to 232 acres under the Proposed Project. Therefore, impacts to cultural resources could be more severe than under the Proposed Project.

Increased Residential Development Densities Alternative

The Increased Residential Development Densities Alternative would affect approximately 20 percent less land (approximately 22,000 acres) than the Proposed Project. Projected land use in the unincorporated areas would be identical to the Proposed Project. Although the locations for increased housing densities have not been identified, existing urbanization and future development in the incorporated areas is less likely to affect known or potential cultural resources than the Proposed Project because of the moderate reduction in land that would be converted to urban uses.

WATER RESOURCES

No Project Alternative

Under the No Project Alternative, development in the incorporated and unincorporated areas would use approximately 4 percent less land county-wide than the Proposed Project. Fewer acres would be converted in the incorporated areas of the Eastside Valley, Westside Valley (incorporated and unincorporated areas), Sierra Nevada foothills, and Coast Range foothills. As with the Proposed Project, the creation of impervious surfaces associated with urbanization would increase the amount of runoff, which could affect water quality. An increase in impervious surfaces could also reduce recharge potential. However, because land demands would be slightly less than the Proposed Project, fewer impervious surfaces would be created, so the magnitude of the impact would be less severe than the Proposed Project.

Under the No Project Alternative, there would be substantial population growth, which would increase demand for domestic water supply, treatment and conveyance. Demand for domestic water would be less under the No Project Alternative than under the Proposed Project, because there would be less non-residential development. Like the Proposed Project, the increased demand would be a significant and unavoidable impact, because the location and nature of facilities to provide water have not been identified, so their impacts cannot be determined at this time.

High Growth Alternative

The total amount of land developed under the High Growth Alternative in 2020 would be approximately 151,300 acres, approximately 31 percent more than the Proposed Project. Most of the development would occur in the unincorporated areas, where existing urban development is limited. Conversion of undeveloped areas to urban uses would create substantially more impervious surfaces than the Proposed Project, which would result in more runoff that could contain urban contaminants. In the foothills areas, increased slopes would compound this effect by increasing the rate of runoff. In the valley areas, the amount of area available for recharge could be decreased because downward migration of rainwater and applied irrigation water would be reduced. This effect would not be as pronounced in the foothills and mountains, where shallower depth to bedrock would tend to limit downward migration. Although new development would be required to implement Best Management Practices to control urban contaminants in runoff, as would be required for the Proposed Project, the magnitude of this impact would be greater than the Proposed Project because the volume of runoff containing urban pollutants would be greater.

This alternative would have a substantially greater population than the Proposed Project. Non-residential development would increase as well. Therefore, the demand for water supply, treatment and conveyance would be substantially greater than the Proposed Project, and would be a significant and unavoidable impact.

Increased Residential Development Densities Alternative

Under the Increased Residential Development Densities Alternative, development in the incorporated and unincorporated areas would use approximately 20 percent less land county-wide than the Proposed Project. Approximately 22,000 fewer acres would be converted in the incorporated areas of the Eastside Valley and approximately 700 acres less in the Westside Valley. The amount of acreage affected in unincorporated areas would be the same as the Proposed Project. To the extent that the disturbance or conversion of undeveloped land to urban uses (assuming most of the undeveloped land is in the unincorporated areas) could increase the amount of runoff or reduce recharge potential, as with the Proposed Project, the magnitude of the impact would be similar to the Proposed Project for those areas. With approximately 20 percent less land consumed in the incorporated areas, potential effects on water quality and recharge could be substantially reduced, as compared to the Proposed Project, because fewer impervious surfaces would be created.

Because the levels of development would be the same, there would be little difference in demand for water supply, treatment and conveyance between this alternative and the Proposed Project. The demand for water would be slightly lower, because fewer acres would be landscaped, and the higher density housing units would typically have lower average daily water demands than the densities proposed under the project. Nonetheless, demand for additional water supply, treatment and conveyance would increase substantially over existing conditions, so the impact would remain significant and unavoidable.

BIOLOGICAL RESOURCES

No Project Alternative

Under the No Project Alternative, development in the incorporated and unincorporated areas would use approximately 4 percent less land (approximately 4,000 acres) county-wide than the Proposed Project. Fewer acres would be converted in the incorporated areas of the Eastside Valley, Westside Valley (incorporated and unincorporated areas), Sierra Nevada foothills, and Coast Range foothills. To the extent that the disturbance or conversion of undeveloped land could affect resident and migratory species and habitat, as with the Proposed Project, the magnitude of the impact would be slightly less severe than the Proposed Project. However, impacts on biological resources would remain significant and unavoidable due to the substantial acreage that would be developed.

High Growth Alternative

Under the High Growth Alternative, the combined development in the SOIs and the unincorporated areas of the county is projected to consume 73,411 acres, which is approximately twice as much land required for the Proposed Project. The most intense urbanization would occur in the unincorporated areas of the Eastside Valley, Sierra Nevada foothills, and Sierra Nevada (approximately 60,000 total acres, as compared to approximately 2,100 acres with the Proposed Project). Growth in these three areas has a greater potential for converting natural habitats and would have a greater effect on biological resources than the Proposed Project. In particular, giant garter snake, remaining vernal pools, and special-status species supported by the seasonally-ponded environment (such as fairy shrimp and rare plants) could be more severely affected in the Eastside Valley than with the Proposed Project because approximately 28,876 acres would be disturbed, as compared to 1,800 acres with the Proposed Project. Urbanization of more land in the Sierra Nevada foothills (1,675 acres, as compared to 232 acres under the Proposed Project) could affect many species of raptors (including the California spotted owl), special-status plants associated with serpentine soils, and migratory corridors for wildlife. In the Sierra Nevada Mountains area, more intense development (927 acres, as compared to 32 acres with the Proposed Project) could affect the spotted owl and large forest carnivore habitat. As with the Proposed Project, impacts on biological habitats would be significant and unavoidable.

Increased Residential Development Densities Alternative

Under the Increased Residential Development Densities Alternative, development in the incorporated and unincorporated areas would use approximately 20 percent less land county-wide than the Proposed Project. Approximately 22,000 fewer acres would be converted in the incorporated areas of the Eastside Valley and approximately 700 acres less in the Westside Valley . The amount of acreage affected in unincorporated areas would be the same as the Proposed Project. To the extent that the disturbance or conversion of undeveloped land (e.g., in the unincorporated areas) could affect resident and migratory species and habitat, as with the Proposed Project, the magnitude of the impact would be similar to the Proposed Project for those areas. With approximately 20 percent less land consumed in the incorporated areas, potential effects on biological resources could be substantially reduced, as compared to the Proposed Project. Nonetheless, such impacts would likely be significant and unavoidable, because of the substantial land (15,000 acres) that would be converted to urban uses.

FORESTRY RESOURCES

No Project Alternative

Almost all of the timberlands in Fresno County lie within the southern part of the Sierra National Forest and the northern portion of the Sequoia National Forest. The No Project Alternative would involve slightly less development in those areas than the Proposed Project. In the Coast Range foothills, there would be a negligible (1-acre) increase in land demand. If timber resources were affected in the Coast Range, this could be offset by the reduction in Sierra Nevada timberlands. Consequently,

timberlands would not be affected to any greater extent than would occur with the Proposed Project. Implementation of the No Project Alternative, which would result in a population increase identical to the Proposed Project, would increase the demand for timber resources for construction. However, the demand would be similar because residential and non-residential densities would be similar. Consequently, this alternative would not result in any significant impacts on timber resources.

High Growth Alternative

Under the High Growth Alternative, the combined development in the SOIs and the unincorporated areas of the county would consume approximately 73,400 acres, which is approximately twice as much land required for the Proposed Project. Projected growth would be largely accommodated in the unincorporated areas of the Eastside Valley, Sierra Nevada foothills, Sierra Nevada mountains areas. It is possible that timberlands in or adjacent to the national forests could be affected, either directly through land transfers, or land use incompatibilities could result. The increase in population would also increase the demand for forest products, which could have adverse effects on supply. Consequently, the High Growth Alternative could result in more substantial impacts than the Proposed Project.

Increased Residential Development Densities Alternative

The Increased Residential Development Densities Alternative would involve no development in unincorporated areas, so timberlands would not be affected to any greater extent than would occur with the Proposed Project. Implementation of the No Project Alternative, which would result in a population increase identical to the Proposed Project, would increase the demand for timber resources for construction. However, the demand would be similar and would not result in any new significant impacts on timber resources.

MINERAL RESOURCES

No Project Alternative

The No Project Alternative would result in slightly less development than the Proposed Project, so there would be fewer potential land use incompatibilities and development of land containing mineral resources that could be developed in the future. Effects related to a potential shortage in aggregate materials would be similar to the Proposed Project. Like the Proposed Project, these impacts would be less than significant for development under County jurisdiction, and significant and unavoidable for development within the cities' jurisdiction.

High Growth Alternative

The High Growth Alternative would result in the development of more land at a greater number of locations throughout the county, as compared to the Proposed Project. To the extent that more intense development could preclude access to mineral resources or result in land use incompatibilities,

mineral resources effects would be greater than those identified for the Proposed Project. Although not an environmental effect, aggregate resources would be consumed at a greater rate than the Proposed Project, which could accelerate depletion of the supply. Like the Proposed Project, these impacts would be less than significant for development under County jurisdiction, and significant and unavoidable for development within the cities' jurisdiction.

Increased Residential Development Densities Alternative

Under the Increased Residential Development Densities Alternative, land use demand projections in the incorporated areas in the East and Westside Valleys are approximately 22 percent lower than the Proposed Project, so there would be fewer potential land use incompatibilities and less development of land containing mineral resources that could be developed in the future. Less land would be developed in Eastside Valley communities along the Kings River, which is gaining importance as a locally available source of aggregate materials for the Fresno-Clovis region. Because population growth and economic development would occur identical to the Proposed Project, effects related to a potential shortage in aggregate materials would be the same. Like the Proposed Project, these impacts would be less than significant for development under county jurisdiction, and significant and unavoidable for development within the Cities' jurisdiction.

AIR QUALITY

No Project Alternative

As with the Proposed Project, growth that would occur under the No Project Alternative would increase vehicle emissions. Under the No Project Alternative, VMT and daily trips would be less than the Proposed Project, and trip lengths would be slightly greater. As with the Proposed Project, the growth in vehicle use would result in increased emissions from both vehicle emissions and entrained road dust that would substantially exceed thresholds for ozone precursors. Although there would be fewer trips and VMT, this would not lower emissions a sufficient amount to result in levels lower than the significance thresholds. Similar to the Proposed Project, there are no additional reasonable mitigation measures available to further reduce mobile source emissions. Therefore, mobile source air quality impacts would be significant and unavoidable with the No Project Alternative, although the magnitude of the impact would be somewhat reduced compared to the Proposed Project.

Future growth would result in several roadways operating at LOS E or F during peak-hour periods of the day. Because increased traffic generated by the No Project Alternative could reduce LOS of roadway links or intersections, the congestion and heavy traffic could cause carbon monoxide (CO) levels to result in "hot spots" or violation of ambient air quality standards. Localized increases in CO levels would be most likely to occur in the more dense, incorporated areas of the county, where future growth would occur, similar to the Proposed Project. In the unincorporated areas, severe congestion and heavy traffic would be less common, and localized CO effects would not be as likely. State-mandated programs for tailpipe emissions have resulted in dramatic reductions of ambient CO concentrations, and the Fresno Urbanized Area has been designated in attainment with CO standards.

With slightly fewer VMT and daily trips, and assuming continued efforts to control CO emissions, the No Project Alternative would not result in any greater CO impacts than those that could occur with the Proposed Project. Like the Proposed Project, these impacts would be less than significant for development under County jurisdiction, and significant and unavoidable for development within the cities' jurisdiction.

Continued growth in the County under the No Project Alternative would increase the amount of construction. County-wide development of new residential uses would affect approximately 24,100 acres, identical to the Proposed Project. New development of non-residential uses would be approximately 4,200 acres less than the Proposed Project. Because fewer acres would be disturbed, construction-related criteria air pollutant emissions, including PM_{10}, would be less than those that would be generated by the Proposed Project. Under the No Project Alternative, construction activities would be required to comply with air district rules and regulations, so construction emissions would be less than significant after mitigation. Overall impacts related to construction emissions would be similar to the Proposed Project, but slightly reduced in magnitude.

Under the No Project Alternative, growth in industries and businesses that generate stationary source emissions would occur, but not to levels anticipated for the Proposed Project. Consequently, potential odors, stationary source emissions, and toxic air contaminants would be less than those generated by the Proposed Project, and would be less than significant.

High Growth Alternative

The High Growth Alternative would result in substantially more daily trips and higher VMT than the Proposed Project. As a result, more vehicle miles will be traveled under conditions that tend to increase the rate of air pollutant emissions. Again, congestion impacts would be directed even more toward the Fresno/Clovis SOIs, where about 74 percent of county VMT experiencing LOS F and about 65 percent of county VMT experiencing LOS D through F would occur (see Table 9 in the *Economic and Growth Scenarios Report*). Most of the county-wide population growth would occur in the Fresno/Clovis SOIs, where congestion-related local air pollutant hot spots would be most likely to occur. The projected VMT increase is slightly above California Air Resources Board guidelines in the San Joaquin Valley APCD's Ozone Attainment Demonstration Plan. If the SJVAB continues to make progress towards achieving ozone standards, the emphasis on constraining VMT growth may diminish.

Because more acres would be disturbed, construction-related criteria air pollutant emissions, including PM_{10}, would be greater than those that would be generated by the Proposed Project, and, as with the Proposed Project, would remain significant and unavoidable. As with the Proposed Project, construction activities would be required to comply with air district rules and regulations, and construction emissions would be less than significant after mitigation.

Growth in industries and businesses that generate stationary source emissions would occur, but not to levels anticipated for the Proposed Project. Consequently, potential odors, stationary source emissions, and toxic air contaminants would be less than those generated by the Proposed Project. Odor impacts would be less than significant.

Increased Residential Development Densities Alternative

Under the Increased Residential Development Densities Alternative, fewer acres would be disturbed because there would housing density would be greater. Therefore, construction-related criteria air pollutant emissions, including PM_{10}, would be less than those that would be generated by the Proposed Project. As with the Proposed Project, construction activities would be required to comply with air district rules and regulations, and construction impacts would be less than significant after mitigation.

Vehicle emissions would be similar to the Proposed Project, but less severe, because there would be fewer vehicle trips, and average trip length would be reduced. Nonetheless, the increase in vehicle emissions would be significant and avoidable.

Growth in industries and businesses that generate stationary source emissions would be the same as the Proposed Project, so potential odors, stationary source emissions, and toxic air contaminants impacts would be similar, and would be less than significant.

SEISMIC AND GEOLOGIC HAZARDS

No Project Alternative

Population growth under the No Project Alternative would be identical to the Proposed Project. Therefore, the same number of people would be exposed to seismic and geologic hazards. However, the amount of land developed would be slightly less than the Proposed Project, both for residential and non-residential uses. Less development would occur in incorporated areas of the Eastside Valley and Westside Valley and the Sierra Nevada foothills, where most of the population growth would occur. As with the Proposed Project, development is subject to numerous State regulations governing the design and construction of buildings. It is not any more or less likely that development would occur in earthquake-prone areas or locations subject to other geologic hazards than would be expected for the Proposed Project. Therefore, the No Project Alternative would result in the same impact as the Proposed Project. However, because the amount of developed land would be less, there would be a commensurate reduction in the risk to property, and the impact would be reduced in magnitude, as compared to the Proposed Project. As with the Proposed Project, these impacts would be less than significant, with the exception of landslide hazards for development occurring outside of the County's jurisdiction.

High Growth Alternative

Implementation of the High Growth Alternative would, in general, expose a greater number of people and structures to seismic and geologic hazards, as compared to the Proposed Project. This alternative would involve a greater amount of growth in the Coast Range foothills, which is prone to more intense seismic effects than the valley floor, as compared to the Proposed Project. The amount of development in the Sierra Nevada foothills would be more than twice that anticipated under the Proposed Project.

Those areas are more susceptible to erosion and landslide hazards than the valley floor. As with the Proposed Project, development would be subject to numerous State regulations governing the design and construction of buildings to minimize such hazards to the extent practical. Consequently, overall impacts would be similar to the Proposed Project, but the extent of injury or property damage could be greater in the event of large-scale events. As with the Proposed Project, these impacts would be less than significant, with the exception of landslide hazards for development occurring outside of the County's jurisdiction.

Increased Residential Development Densities Alternative

Population growth under the Increased Residential Development Densities Alternative would result in an increase in population identical to the Proposed Project. Therefore, the same number of people would be exposed to seismic and geologic hazards. However, because of the increased housing density, the amount of land developed for residential uses would be less than the Proposed Project, so fewer structures would be affected. As with the Proposed Project, development is subject to numerous State regulations governing the design and construction of buildings. It is not any more or less likely that development would occur in earthquake-prone areas or locations subject to other geologic hazards than would be expected for the Proposed Project. Therefore, the Increased Residential Development Densities Alternative would result in the same impact as the Proposed Project, but slightly reduced in magnitude. As with the Proposed Project, these impacts would be less than significant, with the exception of landslide hazards for development occurring outside of the County's jurisdiction.

HAZARDOUS MATERIALS

No Project Alternative

Hazardous materials or consumer products containing hazardous materials are used in industries, businesses, public and private institutions, and households in the county. These activities also produce hazardous waste. The No Project Alternative assumes that population will increase as projected under the Proposed Project, but employment will increase at a lower rate, comparable to historic trends. Thus, the same number of people would be exposed to potential risks associated with the use, storage, transport, and disposal of hazardous materials, although potential workplace exposures may not be as great as the Proposed Project. The increase in population would generate more household-type hazardous waste than the Proposed Project, but the amount and types of hazardous materials used in businesses and industries and the amount of hazardous waste generated may be less than the Proposed Project because employment in the types of industries and businesses would not grow as fast as the Proposed Project. Approximately 4 percent fewer incorporated lands, where soil and groundwater contamination from past uses is more likely to occur, would be converted to urban uses, as compared to the Proposed Project. Consequently, although there would be an increase in population, the potential for encountering or disturbing contaminated land would be less than under the Proposed Project. As with the Proposed Project, these impacts would be less than significant, with the exception of the risk of exposure to contaminated soils or groundwater in areas outside of the County's jurisdiction.

High Growth Alternative

Under the High Growth Alternative, there would be a substantial increase in the number of industries and businesses in which hazardous products may be used. A greater number of people could be potentially exposed to associated hazards, as compared to the Proposed Project. This alternative would develop more land in the unincorporated areas, so redevelopment of known or potentially contaminated sites would pose less of a risk to future populations. Regardless of the amount of the growth and locations where contaminated lands could be redeveloped, numerous federal, State, and local laws and regulations governing hazardous materials would apply, so overall impacts would be similar to the Proposed Project. As with the Proposed Project, these impacts would be less than significant, with the exception of the risk of exposure to contaminated soils or groundwater in areas outside of the County's jurisdiction.

Increased Residential Development Densities Alternative

The Increased Residential Development Densities Alternative assumes that population will increase as projected under the Proposed Project, along with an increase in employment. Thus, the same number of people would be exposed to potential risks associated with the use, storage, transport, and disposal of hazardous materials, but the amount of hazardous potential workplace exposures may not be as great as the Proposed Project. The increase in population would generate the same amount of household-type hazardous waste than the Proposed Project, but there could be more types and quantities of hazardous materials used in businesses and industries and the amount of hazardous waste generated. The Increased Residential Development Densities Alternative would not develop as much land in the incorporated areas as the Proposed Project, so the potential for encountering or disturbing contaminated land would be less than under the Proposed Project. As with the Proposed Project, these impacts would be less than significant, with the exception of the risk of exposure to contaminated soils or groundwater in areas outside of the County's jurisdiction.

NOISE

No Project Alternative

Traffic-generated noise impacts would occur along many of the county's roadways as a result of future growth in the county. Traffic-related noise increase under the No Project Alternative would cause noise levels to increase to within 0.5 dBA of the levels anticipated with the Proposed Project. This difference in noise levels would not be discernible, so traffic-related noise impacts would be similar to the Proposed Project. As population increases, increased aircraft operations associated with future growth would also occur under the No Project Alternative. Because accelerated economic growth would not occur, however, there could be fewer freight transport flights. Similarly, noise levels from fixed sources (e.g., industries) may not be as great as those that could occur with the Proposed Project. However, the reduction in aircraft or fixed-source noise levels, if any, would probably not result in a substantial reduction in noise levels, as compared to the Proposed Project. The No Project Alternative

would add new residential and other sensitive uses to the county where individuals could be exposed to existing or future unacceptable noise conditions. However, new growth would occur in the same areas as the Proposed Project, so impacts would be identical. Overall, noise effects associated with the No Project Alternative would be similar to the Proposed Project.

High Growth Alternative

The High Growth Alternative would generate more vehicular traffic than the Proposed Project, which would result in more traffic-related noise. The High Growth Alternative would add a greater number of new residential and other sensitive uses in areas of the county where those individuals could be exposed to existing or future unacceptable noise conditions. Assuming community noise guidelines are implemented, impacts would be similar to the Proposed Project, but more people would be affected. As with the Proposed Project, increased economic development and population would result in increased aircraft operations and a commensurate increase in aircraft noise levels. The High Growth Alternative would involve the development of fewer industrial activities and a corresponding reduction in noise levels from those fixed noise sources, as compared to the Proposed Project. However, retail and public/institutional development would be greater than the Proposed Project, so noise levels from those activities could offset the industrial levels. Overall, noise effects associated with the High Growth Alternative would be somewhat greater in magnitude than the Proposed Project.

Increased Residential Development Densities Alternative

The number and length of vehicle trips under this alternative would be slightly reduced relative to the Proposed Project. The difference in noise levels would not be discernible, so traffic-related noise impacts would be similar to the Proposed Project. As with the Proposed Project, increased aircraft operations associated with future growth would also occur, so aircraft-related noise effects would be the same. Similarly, noise levels from fixed sources (e.g., industries) would be the same as the Proposed Project. The Increased Residential Development Densities Alternative would add new residential and other sensitive uses to the county where individuals could be exposed to existing or future unacceptable noise conditions. However, new growth would occur in the same areas as the Proposed Project, so impacts would be identical. Overall, noise effects associated with the Increased Residential Development Densities Alternative would be similar to the Proposed Project.

VISUAL QUALITY

No Project Alternative

Under the No Project Alternative, the increase in residential development would alter the existing visual character of the county, including the nighttime character. The alteration would be less severe than under the Proposed Project, because there would be less land developed. Nonetheless, the change in visual character would be significant and unavoidable.

High Growth Alternative

Like the Proposed Project, the High Growth Alternative would substantially alter the visual character of the county. Implementation of Draft General Plan policies and mitigation to minimize "spillover" from lights would reduce the visual impacts of this alternative, but they would remain significant and unavoidable. Furthermore, the impacts would be substantially more severe than under the Proposed Project, because more land would be developed.

Increased Residential Development Densities Alternative

Under the No Project Alternative, the increase in residential development would alter the existing visual character of the county, including the nighttime character. The alteration would be less severe than under the Proposed Project, because there would be less land developed. Implementation of Draft General Plan policies and mitigation to minimize "spillover" from lights would further reduce the visual impacts of this alternative, but they would remain significant and unavoidable. Nonetheless, the change in visual character would be significant and unavoidable.

Relationship of Alternatives to Project Objectives

As noted above, objectives of the Proposed Project are used as the basis for comparing project alternatives and determining the extent that the objectives would be achieved relative to the Proposed Project. The following discussion evaluates the extent to which the objectives would be achieved for the No Project, High Growth, and Increased Residential Development Densities Alternatives.

No Project Alternative

The No Project Alternative would accommodate future growth as projected by the Department of Finance, but would not achieve the objectives of the Proposed Project related to economic development and reduced unemployment, because the Economic Development Strategy would not be implemented. Similarly the objectives to promote compact urban development, minimize the destruction and disturbance of natural habitat, and enhance quality of life would not be achieved to as great an extent as under the project, because the Draft General Plan policies would not be adopted.

High Growth Alternative

The High Growth Alternative would achieve the objectives of the Proposed Project, because the Economic Development Strategy and Draft General Plan policies would be adopted.

Increased Residential Development Densities Alternative

Under the Increased Residential Development Densities Alternative, the objectives of the Proposed Project would be achieved because the Economic Development Strategy would be implemented and

Draft General Plan policies would be adopted. This alternative would be more effective at achieving the objectives to compact urban development and minimize destruction and disturbance of natural habitat because residential densities would be higher than under the Proposed Project, and fewer acres would be developed, so the environmental effects of development would be lessened.

Environmentally Superior Alternative

An EIR is required to identify the environmentally superior alternative from among the range of reasonable alternatives that are evaluated. CEQA Guidelines Section 15126(d)(2) states that if the environmentally superior alternative is the no project alternative, the EIR shall also identify an environmentally superior alternative from among the other alternatives.

The Increased Residential Development Densities Alternative would be the Environmentally Superior Alternative. None of the alternatives would avoid any of the significant impacts identified for the Proposed Project. However, the magnitude of impacts could, in some cases, be substantially lessened by the Increased Residential Development Densities Alternative. In addition, the Increased Residential Development Densities Alternative would achieve all of the objectives identified for the Proposed Project. The following discussion summarizes the results of the environmental analysis for each alternative as it relates to selection of the environmentally superior alternative.

Summary of No Project Alternative

The No Project Alternative would result in the same population growth as the Proposed Project, but there would be fewer jobs. Areas where growth would occur under the No Project Alternative would be similar to the Proposed Project – primarily in the incorporated areas of the Eastside Valley. The level of significance of identified impacts would generally be the same as the Proposed Project. However, the magnitude of those impacts would differ. For most issue areas, effects would be similar or slightly reduced in magnitude. Approximately 4 percent less land would be needed to accommodate the No Project Alternative, so impacts that are generally associated with land use conversion (e.g., land use compatibilities, construction-related air emissions and noise, biological resources, cultural resources, water quality) would not be as great as the Proposed Project. The demand for services and utilities would be similar to the Proposed Project, although there could be some reduction in effects on water, wastewater, storm drainage, and solid waste facilities because the demand or contribution from industrial, commercial, or retail operations would not be the same without increased economic growth. Similarly, there could be a slight reduction in traffic volumes and effects on LOS, criteria air pollutant emissions, and noise levels. Hazardous materials and geologic hazards would be similar to the Proposed Project. Therefore, while the No Project Alternative would result in a slight reduction in the magnitude of potential effects, it would not avoid or substantially lessen any significant effects. Consequently, the No Project Alternative would not be considered environmentally superior.

Summary of High Growth Alternative

With the highest population growth and land demand, the High Growth Alternative would result in the development of more land in all areas of the county, particularly in the unincorporated areas. As

a result, effects on natural resources (water, air, and biological resources, for example) would be more severe than those identified for the Proposed Project. Increased growth in the unincorporated areas would place a greater demand on the need for and extension of infrastructure, which would also result in additional impacts on natural resources. More new development would occur in areas susceptible to geologic and fire hazards. The demand for water would be of particular concern, as compared to the Proposed Project. The High Growth Alternative would result in more trips and higher VMT than the Proposed Project, most of which would occur in already-congested areas. Air emissions (both from construction and operation) would be greater than the Proposed Project and would be dispersed over a larger area. The demand on water resources would be substantially greater than the Proposed Project. While the level of significance of impacts would be the same as the Proposed Project, the magnitude of those impacts would be more severe. Therefore, the High Growth Alternative would not avoid or substantially lessen any significant effects and would not be considered environmentally superior.

Summary of Increased Residential Development Densities Alternative

The Increased Residential Development Densities Alternative would result in the same population and economic growth as the Proposed Project, but less acreage would be consumed because of increased housing density. The level of significance of environmental impacts in all issue areas would be the same as the Proposed Project, but, in many cases, the magnitude of the effects would be reduced. The most dramatic of these reductions would occur in land use-related issue areas. Because approximately 22 percent fewer acres would be needed under this alternative, impacts on land use incompatibilities, agriculture, biological resources, water quality, cultural resources, forestry, and mineral resources could be substantially lessened. Because housing would be more concentrated in a smaller area rather than dispersed over a larger area, there would be fewer effects on infrastructure and services. The effects on water supplies, in particular, could be reduced because there would be fewer impervious surfaces limiting recharge, and landscaping demand would not be as great. While the length of vehicle trips may not be as great as the proposed (resulting in less effects on regional air emissions), there could be more localized effects on air quality and noise levels. The Increased Residential Development Densities Alternative would result in less development in areas where there is greater potential for geologic hazards (e.g., severe groundshaking, erosion, landslides), so the risk to people and property would be lessened. Therefore, of the three alternatives, the Increased Residential Development Densities Alternative is the environmentally superior alternative because it would result in the least severe impacts.